

KENNETH R. GRAHAM, SBN #216733
Law Offices of Kenneth R. Graham
1575 Treat Blvd., Suite 105
Walnut Creek, CA 94598
Tel. No. (925) 932-0170
Fax. No. (925) 932-3940
Email krg@elaws.com

Attorneys for Debtor

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

In re:) Case No.: 10-33275
SEMBRANO, ALICE TAMAYO,)
Debtor.) Chapter 13
)
) **NOTICE AND OPPORTUNITY FOR**
) **HEARING ON MOTION TO AVOID**
) **LIEN OF BANK OF AMERICA, N.A.**
) **SECURED BY 903 FARRIER PLACE,**
) **DALY CITY, CA**
)
) Hearing Date: N/A
) Time:
) Place:
) Judge: HON. THOMAS E. CARLSON
)

TO: THE HONORABLE THOMAS E. CARLSON, U.S. BANKRUPTCY JUDGE;
DAVID BURCHARD, CHAPTER 13 TRUSTEE; THE OFFICE OF THE UNITED STATES
TRUSTEE; AND SECURED CREDITOR, BANK OF AMERICA, N.A.;

PLEASE TAKE NOTICE that Debtor, by and through her attorney of record, KENNETH R. GRAHAM, has moved the Court for an order to avoid lien of creditor, **Bank of America, N.A.**, pertaining to the property commonly known as **903 Farrier Place, Daly City, CA 94014** (“Subject Property”).

MTAL, SEMBRANO, 903 Farrier Place, Daly City, CA

1 PLEASE TAKE FURTHER NOTICE that this matter is governed by Bankruptcy Local
2 Rule 9014-1(b)(3) for the Northern District of California. Any objection to the requested relief,
3 or a request for hearing on the matter, must be filed and served upon the initiating party within
4 21 days of mailing of the notice. A request for hearing or objection must be accompanied by any
5 declarations or memoranda of law the party objecting or requesting wishes to present in support
6 of its position. If there is not a timely objection to the requested relief or a request for hearing,
7 the Court may enter an order granting the relief by default. The initiating party will give at least
8 7 days written notice of hearing to the objecting or requesting party, and to any trustee or
9 committee appointed in the case, in the event an objection or request for hearing is timely made;
10 or the tentative hearing date.

11
12
13 Dated: September 1, 2010

14 By: /s/ Kenneth R. Graham
15 KENNETH R. GRAHAM
16 Law Offices of Kenneth R. Graham
17 Attorneys for Debtor
18
19
20
21
22
23
24
25
26
27
28

MTAL, SEMBRANO, 903 Farrier Place, Daly City, CA